

Forestry Landslides

- **Recommended Decision: Disapprove**
- **Concerns Raised in the Proposed Decision** - Timber harvests on unstable, steep terrain can result in increases in landslide rates which contribute to water quality impairments. A significant number of studies continue to show increases in landslide rates after clear-cutting compared to unmanaged forests in the Pacific Northwest. The State does not have forestry management measures in place to protect high-risk landslide areas to ensure water quality standards maintained and designated uses are fully supported.
- **Reason for Recommended Action** - While the State has adopted more protective forestry rules to reduce landslide risks to life and property and promote voluntary practices to reduce landslide risks through the Oregon Plan, the State does not have additional forestry management measures to protect high-risk landslide areas to ensure water quality standards and designated uses are achieved.
- **Revisions to Proposed Rationale** – The final rationale will include additional science to show that harvesting and road construction on high-risk landslide areas does increase risk of landslides and impact water quality.
- **Concerns raised during public comment period** - Some commenters acknowledged that landslides caused by logging practices such as clear cutting are a real problem in Oregon and additional management measures are necessary to address these impacts. It was noted that Oregon does not have sufficient programs in place to control non-point pollution from forestry practices, particularly due to logging on private lands.

Others expressed their disagreement with the federal agencies' recent decision and argued that the evidence provided by the federal entities was misleading, only focusing on "landslide density relationships" rather than considering the "total number of landslides triggered during major storms". In addition, it was argued that EPA has not offered objective evidence that additional management measures are needed to maintain water quality. It was recommended that EPA consider a broader scale view over longer timeframes to evaluate whether water quality and designated uses are impaired. The commenter added that the federal agencies have not produced any evidence that landslides resulting from forest management activities have caused exceedances in water quality or negatively impacted aquatic life.

- **Status:** Rationale drafted but still working to improve science discussion; summary comments drafted; response to comments not started.